

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALEX HOLMES, JOSH NAVARRO, NICO
TRAMONTANA, BITCOIN VENTURES 2020, LLC,
YASAR CORPORATION and ONEPURPOSE LTD.,

Plaintiffs.

against-

CHET MINING CO, LLC, CHET MINING CO
CANADA LTD., and CHET STOJANOVICH,

Defendants.

**ATTORNEY AFFIRMATION IN
SUPPORT OF APPLICATION
FOR ATTORNEY'S FEES**

Case No.: 1:20-CV-04448-LJL

JOHN F. HARWICK, ESQ., an attorney admitted to practice in this Honorable Court affirms and certifies under penalty of perjury the following:

1. I am a partner with the law firm E. Stewart Jones Hacker Murphy LLP, attorneys for the plaintiffs and judgment creditors in the above-captioned matter. I respectfully submit this Affirmation in support of the application for attorney's fees.

2. On April 13, 2022 this Court granted plaintiffs' motion to hold Chet Stojanovich in contempt of Court and awarded the plaintiffs their reasonable attorney's fees.

3. I submit this affirmation in support of plaintiffs' application for a judgment against the defendants for attorney's fees related to the contempt motion (Dkt #62).

2. I have over twenty-five (25) years of experience as a litigator. Our hourly rate is \$450.00 per hour. The following entries were taken from my firm's contemporaneous billing records in this case.

3. My firm's time entries are as follows:

<u>Date</u>	<u>Rate</u>	<u>Hours</u>	<u>Dollar Amount and Description</u>
11/9/2021	450.00	.80	360.00-Prep for and hold conf call with clients to approve for contempt motion after Friday
11/15/2021	450.00	2.50	1,125.00-Work on contempt motion per clients' instructions
12/20/2021	450.00	.60	270.00-Begin drafting motion for contempt against Chet Stojanovich
12/29/2021	450.00	4.20	1,890.00- Further review and analyze underlying materials (transcripts, subpoenas, etc.) and further draft motion for contempt vs. Chet Stojanovich
1/12/2022	450.00	4.50	2,025.00- finalize and file motion for Contempt including memo of law; call with CS California lawyer re filing; follow up on service of Chet with motion
2/11/2022	450.00	1.50	675.00-prepare for contempt motion hearing Monday
2/14/2022	450.00	1.20	540.00-review contempt motion, attend hearing for contempt vs Chet (Chet appears without counsel)
3/25/2022	450.00	2.80	1,260.00-review CS transcript and sent to clients; attend SNDY conf call with judge re contempt; follow up emails and texts with CS
3/31/2022	450.00	2.50	1,125.00-prepare and file supplemental submission for contempt hearing
4/1/2022	450.00	1.80	810.00-finalize and file contempt papers
4/8/2022	450.00	2.60	1,170.00-prepare for contempt hearing in NYC (SDNY Federal Court)

4/12/2022	450.00	10.50	4,725.00-prepare for, travel to and attend hearing on contempt motion in NYC, prepare proposed order; prepare atty fee affirmation; serve order and transcript re contempt on CS
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The total amount of fees related to contempt motion and attending the various hearings and conferences regarding the same is \$15,975.00.

I respectfully request that the Court issue a judgment against Chet Stojanovich in the form annexed hereto as Exhibit "A" in accordance with the Court's written order entered on April 13, 2022 (Dkt #79).

Dated: April 13, 2022

E. STEWART JONES HACKER MURPHY LLP

By:



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